

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEEDHAM & COMPANY, LLC, :
: Index No. 15 Civ. 2487 (NRB)
Plaintiff, :
: :
-against- :
: :
ACCESS STAFFING, LLC, STEVE :
WEBER, MICHAEL WEINSTEIN, JOSEPH :
TURANO, and GLEN ALBANESE, :
: :
Defendants. :

DECLARATION OF MATTHEW G. DeOREO

I, Matthew G. DeOreo, declare as follows:

1. I am an associate at Tacopina & Seigel, attorneys for Defendant Joseph Turano in the above-captioned Action.
2. I respectfully submit this Declaration in support of Mr. Turano's instant motion to dismiss Plaintiff's Amended Complaint in this Action with prejudice.
3. The sole purpose of this Declaration is to submit Exhibits in further support of this motion. In that regard, I hereby attach the following Exhibits:
 - a. **Exhibit A:** A true and complete copy of Plaintiff's Amended Complaint; and
 - b. **Exhibit B:** A true and complete copy of Plaintiff's original Complaint.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23rd day of October, 2015, in New York, New York.



MATTHEW G. DeOREO (MD-4814)